

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

DUSHANNE ASHLEY,

Plaintiff,

vs

DETECTIVE MIKE CIVIL, shield # 2114,

Defendant.

**NOTICE OF MOTIONS IN LIMINE**

**14-CV-05559**

**PLEASE TAKE NOTICE**, that upon the annexed Memorandum of Law in Support, and the attached Exhibit, and upon all the pleadings and proceedings heretofore and herein, Plaintiff Dushanne Ashley will move this Court before the Honorable Marcia M. Henry, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the Court, for the following in limine relief:

- I. DETECTIVE CIVIL SHOULD BE PRECLUDED FROM INTRODUCING EVIDENCE OF PLAINTIFF'S ARREST AND CONVICTION HISTORY.
- II. THE SPRINT REPORT SHOULD BE EXCLUDED FOR ALL PURPOSES.
- III. MR. ASHLEY AND OTHER WITNESSES SHOULD NOT BE QUESTIONED ABOUT HIS FINANCES.
- IV. EVIDENCE USED TO SUPPORT THE SEARCH WARRANT AND JUSTIFY THE SEARCH SHOULD BE EXCLUDED FOR ALL PURPOSES.
- V. DETECTIVE CIVIL'S "FLY SHEET" IN HIS MEMOBOOK SHOULD BE EXCLUDED UNLESS HE CAN BRING IN THE ORIGINAL DOCUMENT.
- VI. DETECTIVE CIVIL SHOULD NOT BE ALLOWED TO FALSELY IMPLY THAT HE WILL PAY A JUDGMENT HIMSELF.

Dated: New York, New York  
July 14, 2023

Rickner PLLC

By: /s/

Rob Rickner

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